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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

HEALTHCARE PROFESSIONAL RISK
RETENTION GROUP, INC.,

Case No. 2:23-cv-2116-JCM-MDC

Plaintiff,

vs.

CHRISTOPHER KHORSANDI, M.D.,
individually; CHRISTOPHER
KHORSANDI, M.D., PLLC d/b/a VIP
PLASTIC SURGERY; DIANE HAMU,
individually; CRYSTAL TOUCH,
individually; and DOES 1-25,

**STIPULATION TO EXTEND TIME TO
RESPOND TO COMPLAINT FOR
1) DECLARATORY RELIEF; AND
2) RESCISSION (FIRST REQUEST)**

Defendants.

IT IS HEREBY STIPULATED AND AGREED by and between Defendants CHRISTOPHER KHORSANDI, M.D., and CHRISTOPHER KHORSANDI, M.D., PLLC d/b/a VIP PLASTIC SURGERY (hereinafter “Khorsandi Defendants”), and Plaintiff, HEALTHCARE PROFESSIONAL RISK RETENTION GROUP, INC., through their respective attorneys of record as follows:

1. On December 22, 2023 a Complaint for 1) Declaratory Relief; and 2) Rescission was filed, case number 2:23-cv-2116-JCM-MDC.

2. On December 26, 2023, counsel for Plaintiff notified the Khorsandi Defendants of the filing of the Complaint via UPS Overnight mail.

3. The undersigned counsel for the Khorsandi Defendants was retained on January 24, 2024, and he needs additional time to familiarize himself with the allegations of the Plaintiff.

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1 4. The undersigned counsel has previous professional commitments including an en banc
2 argument before the Nevada Supreme Court on February 7, 2024 that prevents him from providing a
3 meaningful response to the allegations in the complaint.

4 5. The Plaintiffs have agreed to the request of the Khorsandi Defendants to extend the
5 deadline for the Khorsandi Defendants to file an answer to the Complaint up to and including
6 February 13, 2024.

7 6. This is the first request for an extension made by the Khorsandi Defendants. They make
8 this request in good faith and not for the purpose of delay.

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10 DATED this 29th day of January 2024.

11 **ANDERSON, McPHARLIN & CONNERS
12 LLP**

13 _____
14 /s/ Jennifer C. Kalvestran
15 Jennifer C. Kalvestran, Esq.
16 Nevada Bar No. 14385
17 601 S. Seventh St.
18 Las Vegas, NV 89101
19 *Attorneys for Plaintiffs*

20 DATED this 29th day of January 2024.

21 **MATTHEW L. SHARP, LTD**

22 _____
23 /s/ Matthew L. Sharp
24 Matthew L. Sharp, Esq.
25 Nevada Bar No. 4746
26 432 Ridge St.
27 Reno, NV 89501
28 *Attorneys for Defendants*

1 **In the future, LR 26-1(b)(1) requires the parties to state the date the first defendant answered
2 or otherwise appeared" because that is the date from which the discovery deadline is measured.**

3
4 **ORDER**

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6 **IT IS SO ORDERED.**

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8 DATED this 31st day of January 2024.

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11 
12 Maximiliano D. Couvillier III
13 United States Magistrate Judge

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I hereby certify that I am an employee of MATTHEW L. SHARP, LTD., and that on this date, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to:

Jennifer C. Kalvestran, Esq.
ANDERSON, McPHARLIN & CONNERS LLP
601 S. Seventh St.
Las Vegas, NV 89101
jck@amclaw.com
Attorneys for Plaintiffs

DATED this 29th day of January 2024.

/s/ Suzy Thompson
An Employee of Matthew L. Sharp, Ltd.